

DICKINSON WRIGHT PLLC
STEVEN A. CALOJARO
Nevada Bar No. 12344
BROOKS T. WESTERGARD
Nevada Bar No. 14300
scaloiaro@dickinsonwright.com
bwestergard@dickinsonwright.com
100 W. Liberty Street, Suite 940
Reno, Nevada 89501
Tel.: (775) 343-7500
Fax: (844) 670-6009

Attorneys for Plaintiff
SATA GmbH & Co. KG

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SATA GmbH & Co. KG, a German
Corporation,

Plaintiff,

v.

ZHEJIANG RONGPENG AIR TOOLS CO.,
LTD dba AEROPRO, a foreign entity

Defendant.

CASE NO.: 2:18-cv-02088-GMN-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND HEARING ON
EMERGENCY EX PARTE MOTION
FOR PRELIMINARY INJUNCTION**

(First Request)

Plaintiff SATA GmbH & Co. KG (“Plaintiff”) and Defendant Zhejiang Rongpeng Air Tools Co., LTD (“Defendant”) (collectively, “Parties”), through their undersigned counsel, hereby respectfully jointly submit this Stipulation to extend the hearing on Plaintiff’s Emergency Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 3):

1. On October 31, 2018, Plaintiff filed its Verified Complaint (ECF No. 1) and its Emergency Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction (ECF Nos. 2 & 3).

2. On December 6, 2018, Defendant filed its Response to Plaintiff’s Emergency Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction (“Response”) (ECF No. 18).

3. On December 14, 2018, Plaintiff filed its Reply to Defendant’s Response to Plaintiff’s Emergency Ex Parte Motion for Temporary Restraining Order and Preliminary Injunction (ECF No. 22).

1 4. On December 20, 2018, this Court held a hearing on Plaintiff's Emergency Ex Parte
2 Motion for Temporary Restraining Order and Preliminary Injunction. At the hearing, this Court
3 ordered supplemental briefing on the Motion. (ECF No. 27). This Court further ordered that a
4 Motion Hearing on the Motion and supplemental briefs would be set for February 12, 2019.

5 5. Defendant filed its Supplemental Response (ECF No. 30) on January 10, 2019 and Plaintiff
6 filed its Supplemental Reply (ECF No. 31) on January 24, 2019.

7 6. Counsel for Plaintiff has conflicts with the current Motion Hearing date that it is unable to
8 reschedule.

9 7. In a case unrelated to this case and Defendant, Counsel for Plaintiff has scheduled
10 depositions in the Northern District of Texas from February 11, 2019 to February 14, 2018.
11 Counsel tried several times to move the depositions in light of the Court's notice of hearing, but
12 was unable to do so due to the availability of the witness and the existing scheduling order in the
13 action. Due to these significant scheduling conflicts, Plaintiff respectfully requests that this Court
14 extend the Motion Hearing to a date on which counsel for both Parties in this case are available.
15 Plaintiff contacted counsel for Defendant, who does not oppose Plaintiff's requested extension.

16 8. Plaintiff submits that good cause exists, and the Plaintiff is not seeking the extension for
17 undue delay. Instead, the Plaintiff is seeking an extension to promote judicial economy by ensuring
18 that the Motion Hearing can be conducted with counsel most familiar with the case and relevant
19 issues present and able to fully argue their respective positions.

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1 9. Therefore, the Parties respectfully request a continuance of the Motion Hearing, to a date
2 convenient to the Court's calendar. The Parties jointly contacted the Court's Judicial Assistance
3 and were informed that the Court is available on February 26, 2019 at 1:00p.m, and therefore the
4 Parties' respectfully requests that Court continue the hearing until this date.

5 DATED this 1st day of February 2019.

DATED this 1st day of February, 2019

6 DICKINSON WRIGHT PLLC

H1 LAW GROUP

7 /s/ Steven A. Caloiaro
8 STEVEN A. CALOIRO
9 Nevada Bar No. 12344
10 BROOKS T. WESTERGARD
11 Nevada Bar No. 14300
12 scaloiaro@dickinsonwright.com
bwestergard@dickinsonwright.com
100 W. Liberty Street, Suite 940
Reno, Nevada 89501
Tel.: (775) 343-7500
Fax: (844) 670-6009

/s/ Diana Rutkowski
Eric D. Hone, Nevada Bar No. 8499
eric@h1lawgroup.com
Jamie L. Zimmerman, Nevada Bar No. 11749
jamie@h1lawgroup.com
Moorea L. Katz, Nevada Bar No. 12207
moorea@h1lawgroup.com
701 N. Green Valley Parkway, Suite 200
Henderson NV 89074
Phone 702-608-3720
Fax 702-608-3759

13 *Attorneys for Plaintiff*
14 *SATA GmbH & Co. KG*

ORRICK, HERRINGTON & SUTCLIFFE LLP
Diana Rutowski, California Bar No. 233878
Pro Hac Vice
drutowski@orrick.com
1000 Marsh Road
Menlo Park, CA 94025-1015
Phone 650-614-7400
Fax 650-614-7401

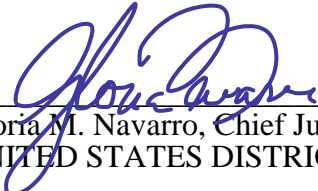
Attorneys for Defendant
Zhejiang Rongpeng Air Tools Co., LTD dba
Aeropro

20 **ORDER**

21 Good Cause appearing, the Motion Hearing is vacated and reset. The Motion Hearing will
22 be held on February 26, 2019 at 1:00p.m.

23 **IT IS SO ORDERED.**

24 DATED this 5 day of February, 2019.

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27 Gloria M. Navarro, Chief Judge
28 UNITED STATES DISTRICT COURT